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24 UBER TECHNOLOGIES, INC.;
25 RASIER, LLC; and RASIER-CA, LLC

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF BRETT D. HARRISON
AND FTI CONSULTING, INC.**

This Document Relates to:

ALL ACTIONS

Declaration of Brett D. Harrison and FTI Consulting, Inc.

I Brett D. Harrison, am a Senior Managing Director within FTI Consulting, Inc.’s (“FTI”) Technology Segment. I currently lead FTI’s Digital Forensics Practice. I have over thirty years of experience assisting clients with Digital Forensic and Electronic Discovery (e-Discovery) related engagements. Since joining FTI, I have led many dozens of engagements involving the investigation of Intellectual Property (IP) theft, forensic data collection and the processing and analysis of data.

Prior to my employment with FTI, I was employed by the Federal Bureau of Investigation (FBI) for fifteen years. For seven of those years (from 1999 until 2006), I worked within the FBI’s Computer Analysis Response Team (CART) Unit in Washington, D.C. The FBI’s CART Unit is responsible for the forensic acquisition and processing of all computers which are examined by the FBI. During my tenure with the CART Unit, I worked as both an FBI Certified Forensic Examiner of computer evidence and as a Program Manager. As a Computer Forensic Examiner, I conducted acquisitions and forensic examinations of a wide range of computers including laptops, desktops and servers as well as computers which utilized both Windows and UNIX operating systems.

Following my certification as a Forensic Examiner, I also served as a Program Manager within the CART Unit and was responsible for ensuring that the FBI’s 400 Forensic Examiners of computer evidence had the necessary knowledge, skills and tools required to perform forensic examinations. As a Program Manager, I focused on leading the development of custom and semi-custom forensic tools to allow the FBI’s Forensic Examiners to accurately collect, preserve, and process data from computer systems.

During the course of my career, I have conducted many hundreds of forensic analyses and have authored hundreds of forensic reports. I have testified in court twenty times in both civil and criminal matters. I have provided numerous written declarations and reports, and have been deposed several times. I have worked on both the plaintiff and defendant sides of many engagements and have even served in a “neutral” capacity on numerous occasions.

FTI is a well-respected, independent, global business advisory firm dedicated to helping

1 organizations manage change, mitigate risk, and resolve disputes: financial, legal, operational,
2 political & regulatory, reputational, and transactional. The organization has more than 8,000
3 consultants and professionals in approximately 27 countries, and every year, FTI helps many
4 thousands of organizations globally transform the way they anticipate and respond to events. The
5 scope of FTI's clients includes, but is not limited to, many of Fortune's Global 100 corporations.
6 I am supported by hundreds of dedicated digital forensics, cybersecurity, incident response, and
7 data and analytics consultants, with cross-functional teams led by those with decades of experience
8 at the highest levels of law enforcement, intelligence, and global private sector institutions

9 FTI is being compensated for work in this matter at its currently standard hourly rates
10 charged for each person working on the project. FTI's rates range from \$225/hour to \$895/hour—
11 depending on the practitioner. Generally, simple forensic work is performed by lower bill rate
12 practitioners, and more complex expert reporting and testimony work is performed by more senior
13 practitioners. My current rate is \$895/hour.

14 No part of my or FTI's compensation is dependent on the contents of this Declaration, the
15 substance of any further opinions I may offer, or the ultimate outcome of this matter.

16 During my review, I relied upon other members of the FTI Technology practice working
17 under my direction. Any reference to "I," "my," "we," or "FTI" include my efforts as well as those
18 working under my supervision.

19 **Background**

20 I have been asked to review Uber's search methodology for identifying ride receipts based
21 upon Plaintiff's submission in the litigation and pursuant to the Defendant Fact Sheet process
22 undertaken by Uber in this litigation and pursuant to the Court's Orders. Also, I have been asked
23 to review and test some of the functionalities offered via the website MakeReceipt[.]com.

24 Below are the details of my review and testing:

25 **Uber's Search Methodology**

26 Prior to the filing of Uber's Motion, and as part of what I understand to be the Defendant
27 Fact Sheet ("DFS") process, Uber attempted to substantiate the altered receipts for the 21
28 Plaintiffs. The process that Uber used to attempt to substantiate the receipts was robust and used

1 industry standard search parameters. Further, I assessed that following that robust search, Uber
2 was not able to locate any of the alleged receipts submitted by the 21 plaintiffs. That is consistent
3 with my conclusion that the receipts have been altered.

4 I assessed, based on the FTI team's review of the receipts and Uber's systems and
5 processes, that in reviewing the receipts Uber spent at least 30 minutes per receipt in unsuccessfully
6 attempting to substantiate the ride. Based on the altered receipts submitted by the 21 Plaintiffs, the
7 effort to investigate was estimated to be at least 10 hours, as part of what I understand to be the
8 DFS process and prior to the filing of Uber's Motion.

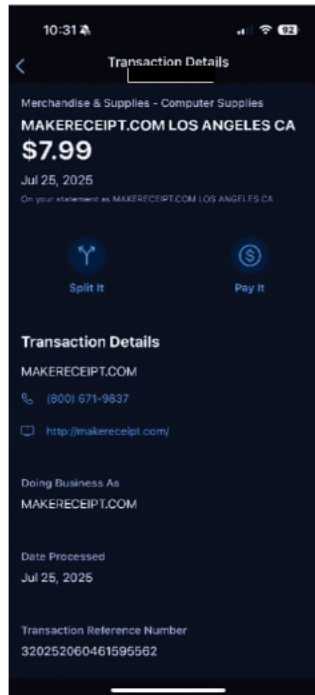
9 **MakeReceipt[.]com Findings**

10 FTI observed the website MakeReceipt[.]com advertised that it provides a membership to
11 "Customize, edit and download your receipt quickly and easily in 3 steps. Change fonts, add logos
12 and modify any receipt details to create your custom receipts. Create receipts with subtotals, taxes,
13 signature, tip lines and more!"

14 We observed with just a few basic inputs, MakeReceipt[.]com provides various
15 membership templates that are web forms that can generate receipts that otherwise appear to have
16 been generated by Uber or other companies.

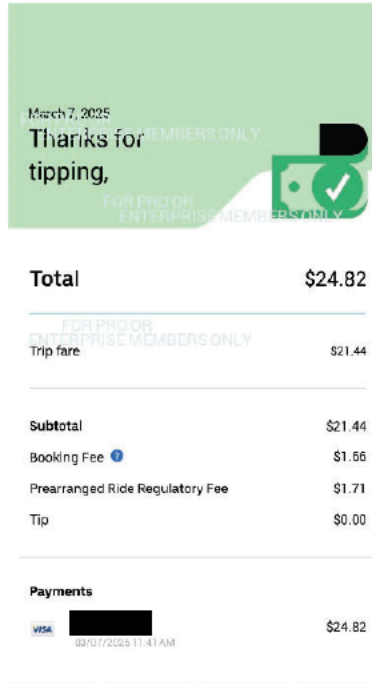
17 We observed MakeReceipt[.]com offered users different levels of membership, including
18 "Standard," "Pro," and "Enterprise" plans.

We observed shortly after signing up for the “Standard” membership plan that the credit card account stated that the transaction occurred with the following transactional information:

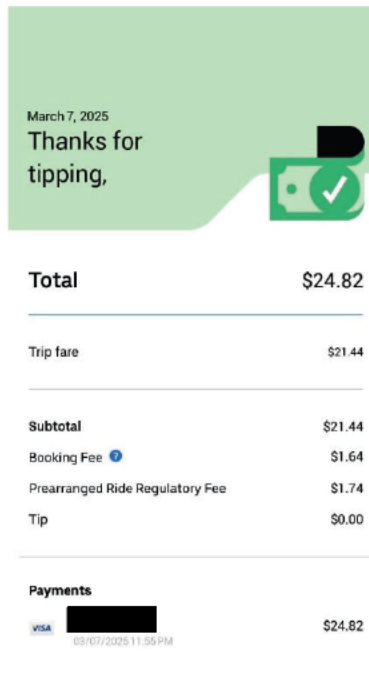


We observed MakeReceipt[.]com contained an FAQ section with the following question and answer: “[Question] Help! I am a member and still see watermarks on my receipt. [Answer] Many of our receipts are for PRO or Enterprise members only. You will see a watermark stating ‘For Pro or Enterprise Members Only’ on these receipts. They are also marked with a PRO emblem on the homepage. Standard members need to upgrade their account from the ACCOUNT page to access these PRO-level receipts. If you are not a member, visit the SIGNUP page to join!”

We observed that MakeReceipt[.]com placed the watermark "FOR PRO OR ENTERPRISE MEMBERS ONLY" on particular receipts when created using the Uber receipt template and using its “Standard” website membership. The following example displays the watermark in the fabricated receipt we created using the “Standard” website membership plan account:



The following example displays no watermark in the fabricated receipt we created using the “Pro” website membership plan account:



We observed that at least in some instances “MakeReceipt[.]com” miscalculated the duration of fabricated trip with a start time that began in “PM” and an end time that completed in “AM”.

We observed that “MakeReceipt[.]com” miscalculated a fabricated trip from March 7, 2025, that began at 11:55 PM and ended at 12:05 AM. The following example displays the miscalculated duration of 23 hours and 50 minutes in the fabricated receipt we created using “Pro” website membership plan account:

Uber Fri, Mar 7, 2025

Here's your updated ride receipt



We hope you enjoyed your ride this evening.

Total	\$24.82
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Trip Fare	\$22.22
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Subtotal	\$22.22
Tolls, Surcharges and Fees	\$2.60

Amount Charged

 	\$24.82
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You rode with Briley

UberX 1.3 miles | 23 hour 50 min


11:55 PM | 506 S Grand Ave, Los Angeles, CA 90071

12:05 AM | STAPLES Center, 1111 S Figueroa St, Los Angeles, CA 90015

We reviewed the embedded metadata tags contained within the PDF files generated using the “MakeReceipt[.]com” website. We observed that the metadata tag “PDF Producer” contained the string “FPDF 1.81” and metadata tag “PDF Version” contained the string “1.3”.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 05/09/2025.

Brett D. Harrison
Senior Managing Director
FTI Consulting Technology

Brett Harrison

Brett D. Harrison






MDL - Declaration of Brett D. Harrison and FTI Consulting Inc (Final)

Final Audit Report

2025-09-05

Created:	2025-09-05
By:	Deborah Hillburn (dhillburn@shb.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAYsedZm59r_EobpZZdtpsWuQZLCztzfdR

"MDL - Declaration of Brett D. Harrison and FTI Consulting Inc (Final)" History

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